

# APPENDIX E: REZONE ANALYSIS

The Seattle Land Use Code requires the analysis of certain types of information for rezone actions. For South Downtown, much of the required information is presented within the body of this report and within the Livable South Downtown Final Environmental Impact Statement (EIS). In addition to these documents, the following pages present analysis of the proposed rezones against specific rezone criteria identified in the Land Use Code.

- Chinatown/International District Rezones West of Interstate 5..... page 109
- Little Saigon and other Areas East of Interstate 5.....page 115
- International Special Review District boundary change ..... page 122
- South of South Dearborn Street..... page 125
- Discussion: proposed amendments to the rezone criteria .....page 131

Each of the above sections is organized as follows:

1. Identification of area proposed for rezone
2. Match Between Zone Criteria and Area Characteristics, evaluating the rezone against locational criteria, identified in the Land Use Code, for each zone

3. Relationship to General Rezone Criteria, addressing the following issues identified in section 23.34.008 of the Land Use Code:
  - Zoned Capacity: Match Between Zone Criteria and Area Characteristics
  - Zoning History: Previous and potential zoning changes both in and around the area proposed for rezone
  - Neighborhood Plans: Council adopted neighborhood plans that apply to the area
  - Zoning Principles: a description of adjacency to less-intensively zoned areas, topographic features, buffers, and zone boundaries
  - Impact Evaluation: summary of conclusions reached through the EIS
  - Changed Circumstances: conditions in the area that have changed since the existing zoning has been in effect
  - Overlay District: If the area is located in an overlay district, the purpose and boundaries of the overlay district are considered
  - Critical Areas: If the area is located in or adjacent to a critical area, the effect of the rezone on the critical area must be considered

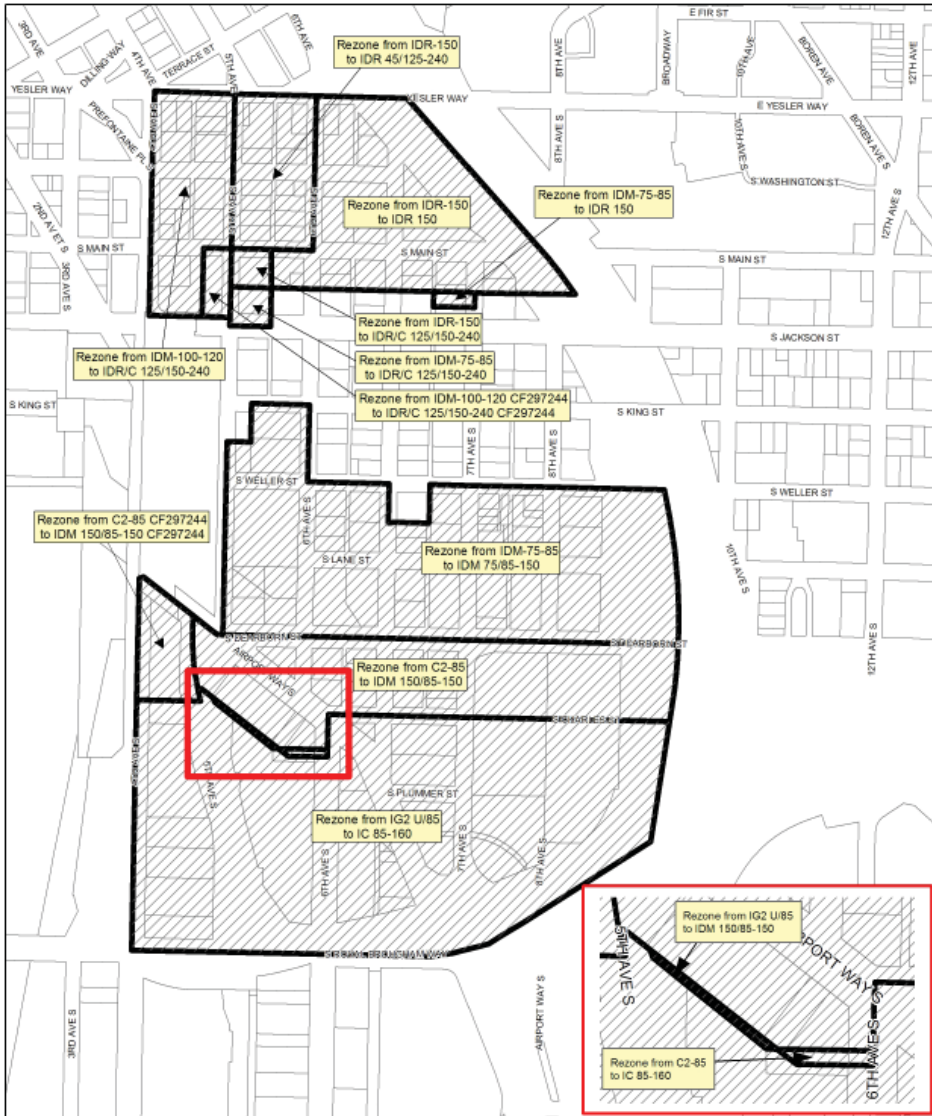
4. Summary Tables

## REZONE ANALYSIS FOR PROPOSED CHINATOWN/ INTERNATIONAL DISTRICT REZONES WEST OF INTERSTATE 5

Proposed rezones in this area including the following:

1. International District Mixed (IDM) to International District Residential (IDR/C)  
Rezone parcels between 4th and 5th Avenues S., south of Yesler Way and north of S. Jackson Street (including property on the east side of 5th Avenue S. between Main Street and S. Jackson Street) from International District Mixed (IDM 100-120) to International District Residential (IDR/C 125/150-240).
2. Commercial 2 (C2) to International District Mixed (IDM)  
Rezone parcels in the first block south of S. Dearborn Street and Airport Way S. between Interstate 5 and 4th Avenue S. from Commercial (C2-85) to International District Mixed (IDM 150/85-150).

The recommended rezones in the Chinatown/ International District west of Interstate 5 are consistent with general and zone-specific rezone criteria in the Land Use Code. The rezones are intended to encourage future development that can achieve the neighborhood’s objectives of a vital, invigorated area that retains cultural identity, affordable and diverse housing, and safe and improved public spaces.



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### Match Between Zone Criteria and Area Characteristics

Locational criteria for the International District Residential (IDR) zone are meant to identify an area “for development as a predominantly residential neighborhood... north of the International District core, contain[ing] parcels available for infill development and possess[ing] topographic features providing view potential.”

Locational criteria for the International District Mixed (IDM) zone are intended for an area “for mixed use development...contained in low and medium scale structures...and includes the area west of 5th Avenue S. bordering Pioneer Square.”

### International District Mixed (IDM) to International District Residential/ Commercial (IDR/C), 4th - 5th Avenue S.

A residential-orientation coupled with higher-density infill development is consistent with the IDR zone, whereas the IDM description of low and medium scale structures is less aligned with the neighborhood plan’s objectives. The location reference in IDM to Pioneer Square likely was meant to maintain a relative parity of this zone with the adjacent Pioneer Square. The Livable South Downtown Planning Study has identified reasons why denser residential development is recommended east of 4th Avenue S. in Japantown, and also for the adjacent Pioneer Square Mixed (PSM) zone.

The increased residential density of the IDR/C zone would complement nearby high-density areas, including the adjacent Japantown, already zoned IDR. This area is well-situated near the Downtown commercial

core and near the existing transit hubs of King Street Station and the transit tunnel stop at Union Station. The area’s proximity to nearby local and regional transit service is consistent with growth management objectives that will remain complementary to the Chinatown neighborhood.

### Commercial 2 (C2) to International District Mixed (IDM), south of S. Dearborn Street

The existing C2 zone is intended for “auto-oriented, primarily non-retail commercial” and manufacturing and warehouse uses serving regional, citywide or community functions. In the past, this area likely fit with these purposes. Today, however, the C2-zone is not suited to current use patterns and contrasts with the Livable South Downtown Planning Study recommendations that encourage denser infill development with mixed uses or commercial uses relating to the International District.

The recommended IDM zone and the accompanying proposed extension of the International Special Review District jurisdiction one block farther south would be better suited than the C2 zone. The one-block area on the south side of S. Dearborn Street is functionally part of the International District neighborhood. Related uses and structures include the Wan Hua warehouse, the former INS Building, William Booth transitional housing, and other existing buildings that form a neighborhood edge south of S. Dearborn Street. The uses of the City’s Charles Street Yards are a contrasting utilitarian use, and include City maintenance functions that are anticipated to remain indefinitely.

## Relationship to General Rezone Criteria

### Zoned Capacity

Analyses in the FEIS indicate that the proposed zone changes would add capacity for approximately 700 dwelling units and reduce employment capacity by approximately 400 jobs in the Chinatown area west of I-5. The proposed rezones would result in a capacity for approximately 3,600 dwelling units and 3,200 jobs, which is sufficient to support anticipated growth targets for at least the next 20 years.

### Zoning History and Precedential Effect

The zoning history of the study area reflects the nature of Seattle's past uses and topography, followed by actions that recognized and defined the Chinatown/International District. Many decades ago, a wide range of commercial and industrial uses were permissible in this neighborhood, as it was located on an edge of Downtown where industries gathered near old shorelines. When shallow tide flats were filled to the south, the new land nearby was also zoned and expected to be used for industrial uses. In the late 1800s and early 1900s, immigrants from Asia had established a center of commerce and daily activity along King, Jackson and Main Streets.

In the early 1970s, recognition of the need for historic and cultural preservation led to the designation of a historic district and a special review district in this area. However, industrial and commercial zones remained in place south of S. Weller Street. By 1985, the current zoning was established, extending the IDM zone throughout the Chinatown core as far south as S. Dearborn Street and as far north as Yesler Way, and a residentially-oriented International District Residential (IDR) zone in the hilly area north of S. Jackson Street.

Precedential effects are not anticipated.

### Neighborhood Plans

Neighborhood plan objectives include establishing a vital, invigorated area that retains cultural identity, affordable housing and business opportunities, adds a diversity of new housing types, and envisions improved and safe public spaces. The recommended rezones are intended to help implement the neighborhood plan, and are largely consistent with the neighborhood plan's goal for this area to grow in a manner complementary to this broader neighborhood's cultural and historic character. The FEIS concluded that the proposed heights could be accommodated without significant adverse land use or height/bulk/scale impacts.

### Zoning Principles

#### 1. IDM to IDR, 4<sup>th</sup> – 5<sup>th</sup> Avenues

The recommended rezone anticipates a future land use character of taller, denser residential uses, while retaining commercial uses that serve the neighborhood. This change would maintain and improve compatibility with the area to the east that is intended for residential use. The proposed zone would maintain compatibility with the Chinatown core south of S. Jackson Street.

The proposed zone would contrast to some degree with the recommended Pioneer Square zone with a 150-foot height limit west of 4th Avenue, but would result in a compatible "stepping up" from that zone. The relatively steep hill to the immediate east also assists in moderating the effects of the increased height in the IDR zone between 4th and 5th avenues. Proximity to the Downtown commercial core and the transit hub are also supportive of the proposed changes.

#### 2. C2 to IDM, south of S. Dearborn Street

The recommended IDM zone would extend a Downtown zone associated with the International District one block

south to this adjacent strip of blocks, and would accommodate uses and building types consistent with the current and future character of the nearby International District. This would acknowledge the role of these blocks as a neighborhood edge and transition area to the commercial/stadium/industrial-oriented area to the south. Commercial, residential or mixed uses are anticipated in the rezoned area. There would be a relatively minor potential for spillover impacts (such as nighttime noise and activity) on potential residential uses near 7th Avenue S., from nearby non-residential uses at the Charles Street Yards. But these would not likely rise to a level of significant incompatibility.

### Impact Evaluation

#### Housing:

These proposed rezones would apply to one property that contains subsidized housing (the Downtowner Apartments), as well as to one that contains transitional housing (William Booth Center) south of S. Dearborn Street. However, no significant negative impact is expected to occur in either case. The Housing chapter of the FEIS provides detailed information about these- and other housing resources.

#### Service/Utility Capacity:

The recommended rezones would place somewhat higher demands on neighboring streets, transit, parking and utility systems. Proposed "green factor" landscaping-related requirement could encourage features such as green roofs and green walls that would assist in limiting drainage runoff intensity. Of the two subject rezone areas, the area near S. Dearborn Street would be expected to experience greater future traffic congestion. However, future development could occur without creating unavoidable street, traffic or transit impacts.



*Environmental Factors:*

Areas proposed for rezones are located in an already-developed urban area that has low potential for natural environmental impacts from future development. Several locations contain artificially steep slopes due to past grading or demolition. Otherwise, topographic conditions in the rezone areas are modest down-slopes toward the south. The FEIS includes other environmental impact analyses related to noise, air quality, energy and shadow impacts, among others. Specific future projects would likely be subject to environmental analysis and mitigation so that site-specific impacts could be alleviated.

*Pedestrian Safety:*

The recommended rezones would not lead to pedestrian safety impacts, and could contribute to better pedestrian conditions in the future through improvements associated with redevelopment.

*Manufacturing Activity:*

The study areas contain little if any manufacturing activity. The rezone to IDM in the single row of blocks south of S. Dearborn Street would preclude general and heavy manufacturing uses.

*Employment Activity:*

The recommended rezones are intended to encourage additional employment, commercial and mixed uses.

*Character of Areas Recognized for Architectural or Historic Value:*

The study area includes some of the city’s most important historic residential structures, places and features with architectural or historic value. The recommendations and the continued applicability of historic and special review district

protections across this area would not likely lead to demolition or loss of such structures or features. The area proposed for rezone includes the former INS Building, the Downtowner Apartments, and the northerly area near 6th Avenue and Main Street, adjacent to Japantown.

*Shoreline Views and Access to Recreation:*

The proposed rezones would potentially enable more shoreline views in future taller buildings. In the Japantown area, the rezone of IDM to IDR and associated future development would increase the potential for impedance of views westward that include views to Puget Sound.

*Nonconforming Uses:*

The creation of nonconforming uses is likely to be minimal as the result of the proposed rezones from IDM to IDR and C2 to IDM.

**Changed Circumstances**

*1. IDM to IDR, 4th- 5th Avenues S.*

This area is close to the Downtown commercial core and the transit hub, where long-standing plans have envisioned infill development. The best opportunity for encouraging infill development is to allow mixed-use or residential-oriented towers in this area to complement the residential focus of the northern Chinatown/I.D. Such development would increase the area’s vitality with new residents and businesses and would increase public safety with more eyes on the street and better activated street environments.

*2. C2 to IDM, south of S. Dearborn St.*

This area in the vicinity of Chinatown to the south of S. Dearborn Street has long been zoned for auto-oriented and non-retail commercial uses. However, over time, the area has changed and is now less characterized by generic

“heavy commercial” uses and more suited to the extension of the Chinatown/International District’s core area. This rezone would support a new and invigorated Chinatown that would be better activated than the current lightly developed pattern of uses and activities in this area.

**Critical Areas**

Identified critical areas within these rezone areas are limited only to artificially created steep slopes due to past grading or demolition. Earthquake liquefaction hazards are also present to some degree due to presence of fill or sandy tide flat soils.

**Overlay Districts**

The area in the vicinity of 4th- 5th Avenues S. is within the Downtown Urban Center and within the International Special Review District. The area currently zoned C2 south of S. Dearborn Street is located within the Downtown Urban Center, and is proposed to be included within the new boundaries of the International Special Review District.



### Summary Tables of Rezone Criteria

The following tables summarize the conclusions regarding rezone evaluation criteria as they apply to the recommended rezones. The tables are presented for ease of reference. The criteria are to be weighed and balanced, but the criteria should not necessarily be given equal weight by decision-makers—some of the criteria may be relatively more important than others.

**1. IDM to IDR rezone, 4<sup>th</sup> – 5<sup>th</sup> Avenues**

Criteria	Evaluation Criterion Favors:		
	IDM	IDR	Neutral
Rezone Evaluation: Zone Function Statements 23.34.007 A		X	
General Rezone Criteria			
1. Capacity to meet Growth Targets			X
2. Within density ranges in Sect. A1 of Comp Plan Land Use Element			X
Match Between Zone Criteria and Area Characteristics 23.34.008 B		X	
Zoning History and Precedential Effect 23.34.008 C		X	
Neighborhood Plans 23.34.008 D		X	
Zoning Principles 23.34.008 E	X		
1. Impact on less intensive zones			
2. Physical buffers		X	
3. Zone boundaries		X	
Impact Evaluation 23.34.008 F			X
Changed Circumstances 23.34.008 G		X	
Overlay Districts 23.34.008 H			X
Critical Areas 23.34.008 I			X

2. C2 to IDM, south of S. Dearborn Street

Criteria	Evaluation Criterion Favors:		
	C2	IDM	Neutral
Rezone Evaluation: Zone Function Statements 23.34.007 A			X
General Rezone Criteria			
1. Capacity to meet Growth Targets		X	
2. Within density ranges in Sect. A1 of Comp Plan Land Use Element		X	
Match Between Zone Criteria and Area Characteristics 23.34.008 B		X	
Zoning History and Precedential Effect 23.34.008 C		X	
Neighborhood Plans 23.34.008 D		X	
Zoning Principles 23.34.008 E			
1. Impact on less intensive zones			X
2. Physical buffers			X
3. Zone boundaries		X	
Impact Evaluation 23.34.008 F		X	
Changed Circumstances 23.34.008 G		X	
Overlay Districts 23.34.008 H			X
Critical Areas 23.34.008 I			X

# ANALYSIS OF REZONES PROPOSED IN LITTLE SAIGON AND OTHER AREAS EAST OF INTERSTATE 5

Proposed rezones in this area include the following:

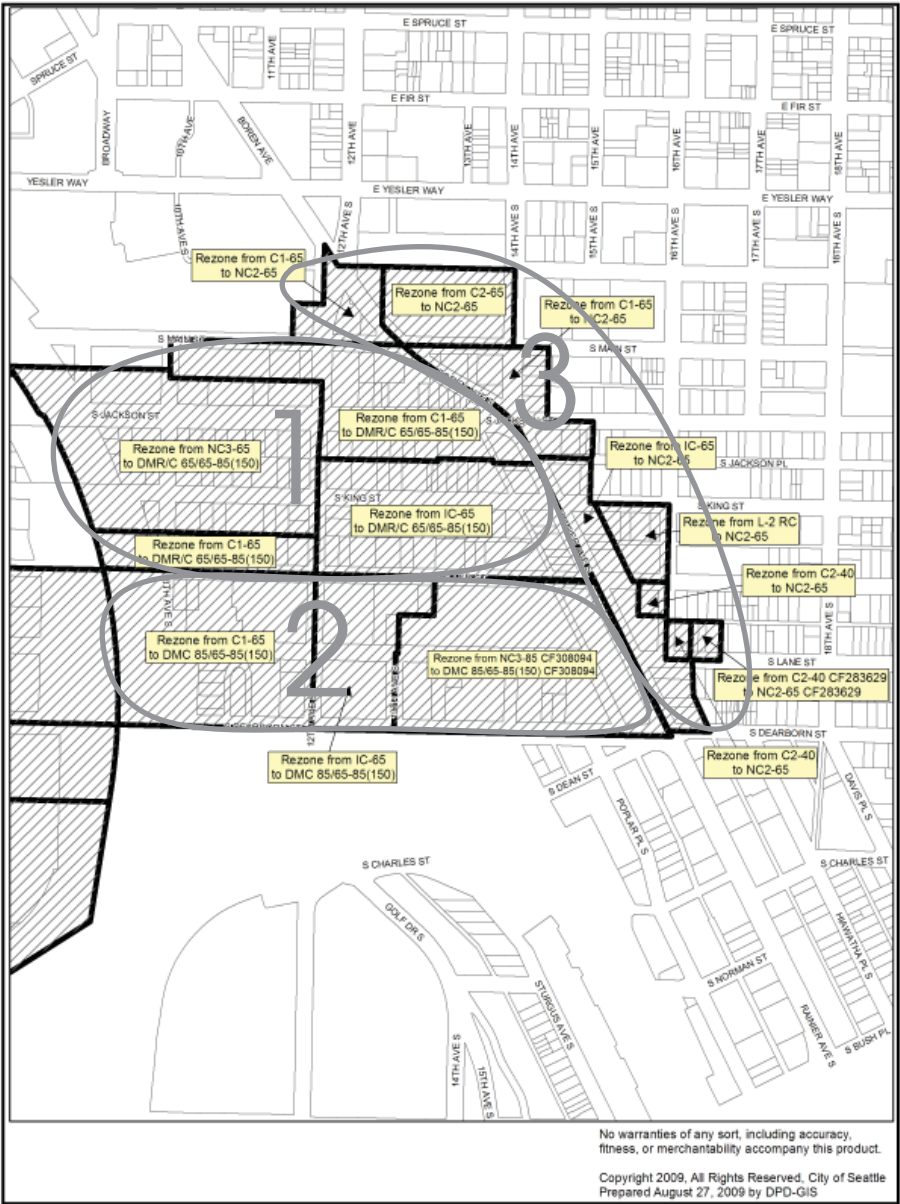
1. From Commercial 1 (C1-65) and Neighborhood Commercial 3 (NC3-65), and Industrial Commercial (IC-65), to Downtown Mixed Residential/Commercial (DMR/C): Little Saigon between Interstate 5 and Rainier Avenue S., and between S. Main Street and S. Weller Street.
2. From IC-65 and C1-65 to Downtown Mixed Commercial (DMC with a height limit ranging up to 160 feet): Dearborn Street vicinity.
3. From IC-65 and C1 and C2 with 65 and 40 foot height limits to NC2-65: the first block east of Rainier Avenue S.

The recommended rezones would replace commercial and industrial zones with a DMC zone (west of Rainier Avenue S.) better reflecting this area’s location within the Downtown Urban Center. The proposed rezone would be consistent with general and zone-specific rezone criteria in the Land Use Code. The recommended rezones would assist in strengthening and defining a

neighborhood core in Little Saigon with a retail emphasis and a much larger residential base than is permitted under current zoning.

The recommended rezones would encourage future infill commercial and mixed-use development while emphasizing ground-floor commercial use in the Jackson Street corridor and encouraging an expanded residential community. The recommendations also encourage:

- retention of cultural and small businesses that form the commercial base of Little Saigon and the remainder of the Chinatown/I.D. neighborhood;
- affordable housing;
- development of an open space network that further enhances pedestrian mobility;
- commercial uses in the Dearborn Street corridor; and
- mixed-use infill in the area east of Rainier Avenue.





# Match Between Zone Criteria and Area Characteristics

Neighborhood Commercial 3 zones “...support or encourage a pedestrian-oriented shopping district that serves the surrounding neighborhood and a larger community, city-wide, or regional clientele”.

Neighborhood Commercial 2 is intended as a zone “...serving a more local clientele, with small and medium-sized neighborhood serving businesses, continuous storefronts built to the front lot line, an atmosphere attractive to pedestrians, where shoppers can drive to the area but walk from store to store.”

Commercial 1 zones are intended “to provide for an auto-oriented, primarily retail/service commercial area that serves surrounding neighborhoods and a larger community, citywide or regional clientele.

Industrial Commercial zones are “intended to promote development of businesses that incorporate a mix of industrial and commercial activities, including light manufacturing and research and development, while accommodating a wide range of other employment activities.”

Downtown Mixed Residential are intended for locations within the Downtown Urban Center that “provide a mixed use community where housing and associated services and amenities predominate.”

Downtown Mixed Commercial zones are intended for locations within the Downtown Urban Center “characterized by lower scale office, retail and commercial uses related to activity in the office and retail cores, mixed with housing and

associated residential services...” with moderate height and bulk scale, providing a physical transition from high density office areas and surrounding lower scale mixed use and residential districts.

*Rezone Little Saigon from C1-65, IC-65, and NC3-65 to Downtown Mixed Residential/Commercial (DMR/C 65/65'-85-150)*

The DMR/C zone matches this area well, focusing on residential-oriented infill and the probability that non-residential commercial uses would also remain. NC3 zoning is more appropriate for locations outside the Downtown Urban Center. The C1 zone’s relationship to locations outside urban centers and villages and at shopping malls, as well as its auto-orientation, makes it clearly less preferable than the Downtown Mixed zone. The IC zone is only a low-to-moderate match with the characteristics of the area and the uses it currently contains. The area’s use and property patterns do not suggest any trend toward campus-like or technology-oriented industrial and commercial development. However, patterns of existing and proposed uses on selected properties indicate a trend transitioning away from moderate-scale industrial or warehouse/wholesale commercial uses and toward denser commercial and/or mixed-use development.

*Rezone S. Dearborn Street corridor from C1-65 and IC-65 to Downtown Mixed Commercial (DMC 85/65'-160')*

The Dearborn Street corridor’s characteristics and use patterns do not match up well with either the C1 or IC zone criteria. The IC zone is appropriate for technology-oriented development, there is no evident trend toward such uses in this area. This area is trending away from industrial oriented uses and toward denser commercial and/or mixed-use

development. This is suggested by projects on other properties nearby. A DMC zone would allow future infill development that is compatible with the broader mixed-use vision for Little Saigon, while also accommodating commercial uses nearer the Dearborn Street corridor.

*Rezone Rainier Avenue corridor from IC-65 to NC2-65*

The IC zone, intended for light manufacturing and research and development, is not well suited to the area east of Rainier Avenue S., which is outside the Downtown Urban Center and adjacent to single-family and low-density multi-family areas to the east. This corridor along Rainier Avenue S. has the potential to support infill commercial or mixed-use development that would help establish a more pedestrian-oriented area of local-serving businesses that would represent a better transition between the Little Saigon neighborhood and the residential neighborhoods to the east. The NC2 zone east of Rainier Avenue S. could help to encourage investment that would further revitalize both the Jackson Street and Rainier Avenue business community.

## Relationship to General Rezone Criteria

### Zoned Capacity

The proposed zone changes would add capacity for approximately 3,500 additional dwelling units and up to 650-750 new jobs. The remaining capacity for approximately 3,900 dwelling units and 8,200-8,300 jobs would help to support anticipated growth beyond the next twenty years.

### Zoning History and Precedential Effect

Historically, this area has been the confluence of downtown office development, residential neighborhoods and the south of downtown industrial areas. The nature of Seattle’s zoning system over the years has reflected the commercial



development that took place along Jackson Street, and the array of industrial and commercial development that was established south of Jackson Street near the heavily regraded area that became the Dearborn Street corridor.

In the 1970s, a portion of the area west of 12th Avenue S. and south of S. Jackson Street was incorporated into the International Special Review District. However, the International District Mixed (IDM) zoning was not applied to this area, perhaps recognizing use patterns that vary from those in Chinatown, as well as the separation from Chinatown caused by the I-5 freeway. The pattern of Commercial, Neighborhood Commercial and Industrial Commercial zones suggests a modest preference for mixed-uses along Jackson Street west of I-5 and recognition of the retail commercial center near 12th Avenue S. and S. Jackson Street, but provides little other guidance as to preferable growth patterns. An allowance for higher residential density in the current NC zone near I-5 reinforces the mixed-use theme west of 12th Avenue S.

Precedential effects of the recommended rezones are not anticipated.

### **Neighborhood Plans**

Neighborhood plan objectives include a vital, invigorated area that retains cultural identity and a diverse and affordable range of new housing. The plan also envisions new and improved public spaces.

The themes of the neighborhood plan are generally applicable to the entire Chinatown/I.D. neighborhood, including Little Saigon. In Little Saigon the plan encourages businesses providing goods and services to a regional clientele, and the presence of cultural institutions and human

services catering to the area's Asian American community. Encouraging the continued presence of this small-business community and accompanying institutions is part of maintaining and growing the area's vitality and character.

The recommended rezones would help implement the neighborhood plan's themes and objectives. The DMR/C zone would support the small business community in the S. Jackson Street area and encourage more residential uses. The zoning incentives for public spaces and pedestrian connections would encourage improved, activated and linked public spaces.

On the Rainier Avenue S. corridor, recommended NC zones are consistent with the objectives of the Central Area Neighborhood Plan for mixed-use development and improved pedestrian-oriented streetscapes. This could provide for a more effective transition between neighborhoods.

### **Zoning Principles**

For the Jackson Street commercial corridor, the recommended rezone would accommodate denser infill commercial and mixed-use development as a transition toward the Yesler Terrace property to the north. This area is believed able to accommodate a maximum height of 150 feet without significant scale impacts, due in part to the terraced topography. Zone edges are defined by Rainier Avenue S., Boren Avenue S., Bailey Gatzert School toward the north and east and I-5 to the west.

The proposed DMR/C zone east of I-5 supports a larger residential community in Little Saigon. In addition, allowing the maximum height for buildings containing residential uses to only be attained by the provision of through-block public space pedestrian connections will help to overcome

the large east-west blocks that discourage pedestrian travel today.

The proposed DMC zone near S. Dearborn Street would support commercial and mixed use development that corresponds with identified community goals for the area. Neighborhood edges include S. Dearborn Street to the south, Interstate 5, Rainier Avenue South, and a steep slope that terminates at S. Weller Street. The recommended NC2 zone east of Rainier Avenue S. would provide for a buffer and transition between this area and the Jackson Place residential area east of Rainier Avenue S.

### **Impact Evaluation**

#### *Housing:*

Because Little Saigon contains very little housing, there is minimal potential for housing impacts. The South Downtown FEIS identified no risks to the Victorian Row Apartments, a designated landmark; the Native American housing and service complex near S. Weller Street and 12th Avenue S.; housing at locations east of Rainier Avenue S.; or to the Pacific Rim mixed-use building on S. Jackson Street.

#### *Service/Utility Capacity:*

The recommended rezones would place somewhat higher demands on neighboring streets, transit, road, parks and utility systems. A deficit of park and open space to serve projected growth in this area is identified, suggesting the need for additional parks and open space over the next 10-20 years.

Storm sewers may be constrained, suggesting a possible need for a heightened level of drainage control to be included on-site in future development. Review and conditioning of proposed development and the proposed application of "green factor" requirements would address drainage control.

*Transportation:*

The area near S. Dearborn Street would be expected to experience somewhat greater levels of traffic congestion than other parts of this district. Livable South Downtown EIS transportation studies have also identified a potential capacity concern with future transit service, in terms of available buses and seat capacity given forecasted future service in the year 2030, a programmatic-level impact that is only modestly related to this area’s future development and these particular zoning choices in Little Saigon.

*Environmental Factors:*

The study areas are located in an already-developed urban Downtown area that has moderate-to-low potential for “natural environment” impacts from future development. In terms of “built environment” impacts, the FEIS indicates potential for future development that could lead to Little Saigon evolving away from its current use mix, and seeing a denser infill of mixed-use development.

*Pedestrian Safety:*

The recommended rezones would not lead to pedestrian safety impacts, and could contribute to better pedestrian conditions in the future through improvements associated with redevelopment.

*Manufacturing Activity:*

The area contains a fairly limited and scattered presence of manufacturing and product processing activity in some buildings, most notably poultry processing in a facility between Jackson and King Streets west of 12th Avenue S. Rezones are unlikely to have a substantial effect on manufacturing activity in the near term, but over the long term some available facilities for small-scale product manufacturing could be redeveloped with other mixed-use or retail commercial developments. The pace of such change

would depend upon the area’s overall competitiveness in attracting new infill development.

*Employment Activity:*

According to analyses prepared for the Livable South Downtown FEIS , the recommended rezones could generate additional employment of approximately 2,000 employees in Little Saigon by 2030. While the rezones in and of themselves would not be expected to immediately spur redevelopment, they would be a contributing factor to future development that could cause the displacement of some businesses in the area over time.

*Character of Areas Recognized for Architectural or Historic Value:*

A small number of structures are identified to have cultural or historic value and are current or potential landmarks. These are documented in the Livable South Downtown FEIS.

*Shoreline Views, Access and Recreation:*

The proposed rezones may enable more distant shoreline views in taller buildings, however, under current conditions, the area is not near shorelines and has no relationship to shoreline views, or shoreline access and recreation.

*Nonconforming Uses:*

A limited number of nonconforming uses may be created by the proposed DMC and DMR zones, mainly due to prohibitions on outdoor storage uses and general and heavy manufacturing uses. For the area east of Rainier Avenue S., there is a minor potential for increased nonconformity because the NC2 zoning would place size limits on certain business types and would newly prohibit certain use types such as general manufacturing.

**Changed Circumstances**

Analysis of the area, including those undertaken for the Livable South Downtown FEIS, suggest that the existing pattern of C1, NC3 and IC zones do not support the best interests of today’s Little Saigon neighborhood which has developed in spite of the patchwork zoning that characterizes the area. The recommended rezones support a more coherent zoning pattern to encourage the growth of a mixed use neighborhood in Little Saigon.

**Critical Areas**

Critical areas present in this area include the intermittent presence of previously-modified slopes, some of which might be subject to future landslide hazard, and the presence of liquefaction-prone soils in the Dearborn Street corridor in part due to local soil conditions that relate to past placement of fill.

**Overlay Districts**

The proposed rezone areas are within the Downtown Urban Center, except a segment east of Rainier Avenue S., and north of Boren Avenue S., which are located in the 23rd Avenue South @ South Jackson-Union Residential Urban Village. Most areas west of 12th Avenue S. are located within the International Special Review District. The proposal would not re-designate or eliminate overlay districts, and the proposed rezones would better reflect the values represented by these designations.

Summary Tables of Rezone Criteria

1. Rezone Little Saigon from C1-65, IC 65 and NC3-65 to Downtown Mixed Residential/Commercial (DMR/C 65/65-85 (150))

Criteria	Evaluation Criterion Favors:				
	C1	IC	NC3	DMR/C	Neutral
Rezone Evaluation: Zone Function Statements 23.34.007 A				X	
General Rezone Criteria					
1. Capacity to meet Growth Targets				X	
2. Within density ranges in Sect. A1 of Comp Plan Land Use Element					X
Match Between Zone Criteria and Area Characteristics 23.34.008 B				X	
Zoning History and Precedential Effect 23.34.008 C				X	
Neighborhood Plans 23.34.008 D				X	
Zoning Principles 23.34.008 E					
1. Impact on less intensive zones					X
2. Physical buffers				X	
3. Zone boundaries				X	
Impact Evaluation 23.34.008 F					X
Changed Circumstances 23.34.008 G				X	
Overlay Districts 23.34.008 H					X
Critical Areas 23.34.008 I					X

2. Rezone Dearborn Street corridor from C1-65 and IC-65 to Downtown Mixed Commercial (DMC 85/65-150)

Criteria	Evaluation Criterion Favors:			
	C1	IC	DMC	Neutral
Rezone Evaluation: Zone Function Statements 23.34.007 A			X	
General Rezone Criteria				
1. Capacity to meet Growth Targets			X	
2. Within density ranges in Sect. A1 of Comp Plan Land Use Element				X
Match Between Zone Criteria and Area Characteristics 23.34.008 B			X	
Zoning History and Precedential Effect 23.34.008 C				X
Neighborhood Plans 23.34.008 D				X
Zoning Principles 23.34.008 E				
1. Impact on less intensive zones			X	
2. Physical buffers			X	
3. Zone boundaries			X	
Impact Evaluation 23.34.008 F				X
Changed Circumstances 23.34.008 G			X	
Overlay Districts 23.34.008 H				X
Critical Areas 23.34.008 I				X



3. Rezone Rainier Avenue corridor from IC-65 to NC2-65)

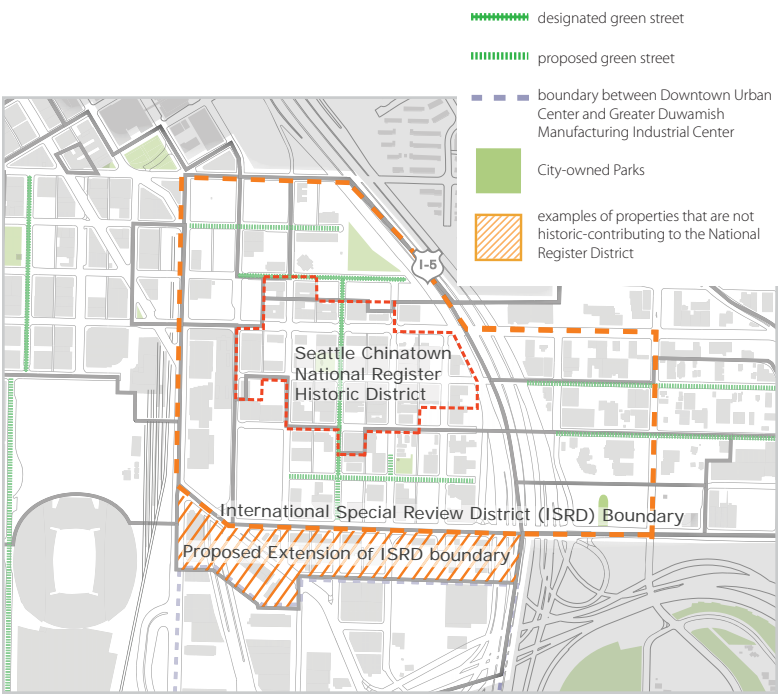
Criteria	Evaluation Criterion Favors:		
	IC	NC2	Neutral
Rezone Evaluation: Zone Function Statements 23.34.007 A		X	
General Rezone Criteria			
1. Capacity to meet Growth Targets			X
2. Within density ranges in Sect. A1 of Comp Plan Land Use Element			X
Match Between Zone Criteria and Area Characteristics 23.34.008 B		X	
Zoning History and Precedential Effect 23.34.008 C		X	
Neighborhood Plans 23.34.008 D		X	
Zoning Principles 23.34.008 E			
1. Impact on less intensive zones		X	
2. Physical buffers		X	
3. Zone boundaries		X	
Impact Evaluation 23.34.008 F		X	
Changed Circumstances 23.34.008 G		X	
Overlay Districts 23.34.008 H			X
Critical Areas 23.34.008 I			X

# ANALYSIS OF REZONE PROPOSED FOR THE INTERNATIONAL SPECIAL REVIEW DISTRICT FROM C2 ZONE TO IDM ZONE, INCLUDING A PROPOSED CHANGE TO THE SPECIAL REVIEW DISTRICT BOUNDARY

## Introduction

The International Special Review District boundary is proposed to be expanded one block south of S. Dearborn Street (and Airport Way), east of 4th Avenue S. and west of Interstate 5 and the area is proposed to be rezoned from C2 zoning to IDM zoning.

The proposed expansion of the International Special Review District boundary and accompanying rezone recognizes that the area is part of Chinatown/ID neighborhood. The proposal is consistent with the City’s Comprehensive Plan and the intent of the Chinatown/International District’s neighborhood plan. The boundary change and rezone would encourage future growth that complements and strengthens the International District neighborhood. Development proposals within an IDM zone are subject to special review processes and review conducted by the International Special Review District Board.



## Match Between Zone Criteria and Area Characteristics

The IDM is meant “for mixed use development...contained in low and medium scale structures...and include the area west of 5th Avenue bordering Pioneer Square.”

South of Dearborn Street, the existing C2 zone is intended for “auto-oriented, primarily non-retail commercial” and manufacturing and warehouse uses serving regional, city-wide or community functions. While C2 zoning may have served the area well in the past, it has outlived its usefulness and is unsuited to the community envisioned today.

The area is characterized by uses and structures including the Wan Hua warehouse, the former Immigration and Naturalization Service (INS) Building, William Booth transitional housing, among other existing buildings that form a neighborhood edge south of Dearborn Street. The Charles Street Yards remain a contrasting utilitarian use and include City maintenance functions as part of a larger property that extends further south.

## Relationship to General Rezone Criteria

### Zoned Capacity

The proposed boundary change would not have any effect on zoned capacity.

### Zoning History and Precedential Effect

Over the years, a wide range of commercial and industrial uses located in this neighborhood as it was located on the southern edge of Downtown where industries gathered near old shorelines. When shallow tide flats were filled to the south, the new land nearby was also zoned for industrial uses. In the late 1800s and early 1900s, immigrants from Asia had established a center of commerce and daily activity along King, Jackson and Main Streets.

In the early 1970s, historic and cultural preservation efforts led to the designation of a historic district and the special review district in this area, with the greatest protections afforded to the historic center of culture, commerce and living. However, industrial and commercial zones remained south of S. Weller Street. By 1985, zoning reflected the mix of uses that had established a presence in the area over the years. The International District Mixed (IDM) zone was established throughout the Chinatown core as far south as S. Dearborn Street and as far north as Yesler Way, and a

residentially-oriented International District Residential (IDR) zone in the area north of S. Jackson Street.

**Neighborhood Plans**

The long-term neighborhood plan objectives include establishing a vital, invigorated area that retains cultural identity and a diversity of housing, including affordable housing, and improved public spaces. The recommended boundary change and associated rezone are intended to help implement the neighborhood plan, and are largely consistent with the neighborhood plan’s intent to grow in a manner complementary to this area’s cultural and historic character.

**Zoning Principles**

The boundary change and proposed IDM rezone would extend a zone associated uniquely with the International District one block south to this adjacent strip of blocks, and would accommodate uses and building types that would be consistent with the current and future character of the International District. The proposed zoning acknowledges these blocks’ role as a neighborhood edge and transition area to the commercial/ industrial-oriented area to the south. Over the long term, other commercial uses such as offices would be expected to infill the area to the south, with lesser potential for spillover impacts.

**Impact Evaluation**

*Housing:*

This proposed boundary change area includes one property with a transitional housing building (William Booth Center) south of Dearborn Street. However, no significant adverse impact on that housing is anticipated.

*Service/Utility Capacity:*

The proposed boundary change would not generate effects on service and utility capacity. An associated rezone

to IDM would generate some potential for added demands imposed on services and utilities.

*Environmental Factors:*

The Livable South Downtown FEIS includes environmental impact analyses related to noise, air quality, energy and shadow impact topics, among others. However, the proposed boundary change would not have a direct bearing on increased potential for such impacts.

*Pedestrian Safety:*

The recommended boundary change and rezone would not lead to pedestrian safety impacts, and could contribute to better pedestrian conditions in the future through improvements associated with redevelopment.

*Manufacturing Activity:*

The area contains little if any manufacturing activity. The rezone to IDM in the single row of blocks south of Dearborn Street would preclude general and heavy manufacturing uses.

*Employment Activity:*

The recommended boundary change and associated rezone is not expected to generate significant adverse impacts on employment activity, and could encourage additional employment growth.

*Character of Areas Recognized for Architectural or Historic Value:*

No adverse effects are anticipated. The inclusion of the area within the Special Review District would afford greater protection to historic and architectural resources.

*Shoreline Views and Access to Recreation:*

These proposed rezones could enable more shoreline views in future taller buildings. The properties in their current conditions do not have shoreline views or access to recreation.

*Nonconforming Uses:*

No nonconforming uses are likely to be created by the boundary change or proposed rezone from C2 to IDM.

**Changed Circumstances**

The area proposed for rezone does not reflect the character desired for the existing C2 zone. The area is best incorporated into the International District and would fare best under IDM zoning which is better suited to the Downtown Urban Center. The proposed boundary change would recognize a new role for the International Special Review Board to review proposals for this area.

**Critical Areas**

Earthquake liquefaction hazards are present in the western half of this area due to the probable presence of fill or sandy tide flat soils, as well as nearby faults.

**Overlay Districts**

The area subject to boundary change is within the Downtown Urban Center. The proposed boundary change would extend the International Special Review District one block south of the current southern boundary. The area is adjacent to the Union Station Corridor. A parking garage accessory to Union Station is present within the area subject to the boundary change. This analysis does not identify any adverse effects to any of these districts.

Summary Table of Rezone Criteria

Criteria	Evaluation Criterion Favors:		
	Existing Boundary	Proposed Boundary	Neutral
Rezone Evaluation: Zone Function Statements 23.34.007 A		X	
General Rezone Criteria			
1. Capacity to meet Growth Targets		X	
2. Within density ranges in Sect. A1 of Comp Plan Land Use Element		X	
Match Between Zone Criteria and Area Characteristics 23.34.008 B		X	
Zoning History and Precedential Effect 23.34.008 C		X	
Neighborhood Plans 23.34.008 D		X	
Zoning Principles 23.34.008 E			
1. Impact on less intensive zones			X
2. Physical buffers			X
3. Zone boundaries		X	
Impact Evaluation 23.34.008 F		X	
Changed Circumstances 23.34.008 G		X	
Overlay Districts 23.34.008 H		X	
Critical Areas 23.34.008 I		X	

Summary Comments

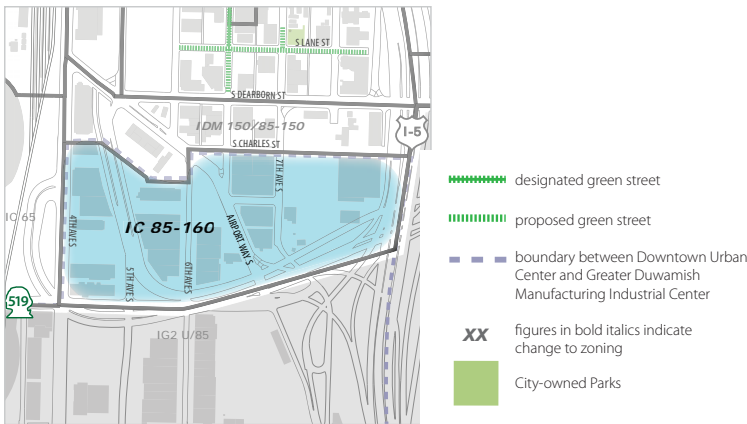
Extending the International District zoning one block further south of S. Dearborn Street will maintain consistency between the IDM zoned area and the special review district boundaries within which the International Special Review District Board reviews development proposals. This would extend the area addressed by Board reviews, but no adverse impacts are identified from this boundary change. Other potential impacts relating to the IDM zone change were previously examined in the FEIS for the Livable South Downtown Planning Study, as well as another rezone analysis.



# REZONE ANALYSIS FOR THE SOUTH OF SOUTH CHARLES STREET AREA

## Introduction

The 23.3 acre “South of S. Charles Street” area is located south of S. Charles Street, west of Interstate 5, east of 4th Avenue S., and north of S. Royal Brougham Way and the Interstate 90 ramps.



The area proposed for rezone is located within the Greater Duwamish Manufacturing/ Industrial Center (MIC). The proposal is to rezone the area from a general industrial designation with an 85 foot height limit (IG2U/85) to the Industrial-Commercial zone allowing heights up to 160 feet (IC 85-160).

The subject area is traversed by several arterial streets, including Airport Way S., S. Royal Brougham Way and Fourth Avenue S. with moderate-to-large traffic volumes that

include buses, passenger vehicles and trucks. S. Dearborn Street is located north of the subject area. Two light rail transit stations are located within one half mile of this area.

Several streets in this area are designated as “major truck streets.” Freight vehicle trips have declined in recent decades due to construction of SR 519, which is the most direct route for many trucks to I-90 and I-5. However, Seventh Avenue S. and Airport Way S. continue to carry freight north and south.

## Match Between Zone Criteria and Area Characteristics

### General Industrial 2

The function of this zone is “an area with existing industrial uses that provides space for new industrial development and accommodates a broad mix of activity, including additional commercial development, when such activity improves employment opportunities and the physical conditions of the area without conflicting with industrial activity.” This zone’s locational criteria describe areas:

- “...developed with industrial activity or a mix of industrial activity and a wide range of commercial uses;
- “...where facilities, such as [the athletic stadiums]... have established a more commercial character for the surroundings and have created the need for a broader mix of support uses;
- “...with adequate transportation network access and network capacity;
- “...where increased commercial densities would allow the economic reuse of small sites.”

In this peripheral portion of the MIC, existing uses are predominantly commercial in nature with automobile sales and services prominent at this time. While existing buildings may have served warehousing functions in the past, they now support various commercial services such as printing and signage. The City’s Charles Street Yards provide a range of maintenance functions, including uses classified as light industrial. These uses would continue to be allowed under either the IC or IG2 zone. Proximity to downtown, location of the athletic stadiums, and other factors generally established a trend of more commercial character in the area than other portions of the MIC. The recent construction of a two-block automobile dealership suggests a continuing trend toward commercial uses. The transportation network access and network capacity is adequate to serve the area given the proximity to major highways and light rail. The subject area is also one where increased commercial densities may allow for economic use of some sites.

While the area conforms to locational criteria that describe a broader mix of activity than traditional industrial zones and an adequate transportation network, the area no longer contains a substantial number of existing industrial uses that is a characteristic of an IG2 zone, nor is it likely to accommodate substantial new industrial development. This shift is due to a number of factors that make it less desirable for industrial uses including a limited number of parcels, irregular parcel shapes, and current use and land assembly patterns, as well as factors that make it increasingly attractive for more commercial uses such as the area’s proximity to Downtown, the International District, and proximity to light rail.

### Industrial Commercial

The function of this zone is “to promote development of businesses which incorporate a mix of industrial and commercial activities, including light manufacturing and research and development, while accommodating a wide range of other employment activities.” Like the IG2 zone, most residential uses are not permitted within the IC zone. The IC zone locational criteria are characterized as:

- “Areas with amenities such as shoreline views, proximity to downtown, or access to public open spaces that could provide an attraction for new businesses, particularly new technology-oriented and research and development activities which might otherwise be likely to seek locations outside the city;
- Areas in close proximity to major institutions capable of providing support for new technology-oriented and research and development businesses;
- Former industrial areas that are undergoing a transition to predominantly commercial or mixed commercial and industrial activity, but where transportation and/or other infrastructure capacities are constrained and can only accommodate modest growth without major improvements;
- Areas where there is an existing concentration of technology-oriented and research and development uses which may be subject to displacement by commercial development;
- Areas which are underutilized and, through substantial redevelopment, could provide the type of campus-like environment attractive for new technology-oriented industrial and commercial development.”

The South of South Charles Street area is consistent with four of the IC zone locational criteria. Regarding the “amenity” criteria, the area’s adjacency to the Chinatown/ International District neighborhood, downtown, light rail stations, and three major highway routes could provide an attraction for new businesses and their employees. Given its proximity to these resources and the intensity of adjacent zoning, the area is relatively underutilized and has the potential to be attractive to industrial and commercial development. This area is particularly suited for larger developments. The area aptly fits the description of “former industrial areas that are undergoing a transition to predominately commercial or mixed commercial and industrial activity” and is likely to continue this direction given the availability of local resources. Infrastructure capacities are also moderately constrained as there is limited pedestrian environment and my businesses rely on the area for freight traffic.

The subject area is also relatively consistent with the “proximity to major institutions” criterion, because it is located within approximately ¾ mile of Harborview Medical Center and is located near highways and light rail lines that provide direct connections to the University of Washington.

The area is not consistent with the criterion related to potential displacement of existing technology or R&D uses. However, this criterion generally reflects a concern that more intense commercial zone such as C1 or C2 could displace R&D use, therefore these zones are not considered appropriate for this area.

Overall, area characteristics are more compatible with zone criteria of the IC zone rather than the existing IG2 zone. Given the increasingly commercial nature of the area and its proximity to multiple amenities, the area appears to

more closely match the mix of industrial and commercial activities envisioned in the IC zone. The IC zone is reinforced by the area’s location at an edge of the MIC with intervening uses and highway facilities that separate it from the heart of the MIC further to the south and orient it more toward the Chinatown-International District.

### Relationship to General Rezone Criteria

#### Zoned Capacity

Under either existing or proposed zoning, there would be sufficient zoned capacity to meet growth targets (9,750 additional jobs from 2004-2024) adopted in the Comprehensive Plan. The subject area represents less than 1 percent of the MIC. The proposed zoning would increase the overall zoning capacity within the MIC and thus the potential amount of future employment.

#### Zoning History and Precedential Effect

The South of South Charles Street area has long-served as a transition between intensive commercial/mixed uses to the north, and commercial/industrial uses to the south. Many decades ago, a wide range of commercial and industrial uses were established in the neighborhood as it was located on the southern periphery of Downtown near former shorelines. When tidelands were filled about 100 years ago south of the subject area, the new lands were used for manufacturing and industrial uses. North of the subject area, in the late 1800s and early 1900s immigrants from Asia established a center of commerce and daily activity along King, Jackson and Main Streets.

In the early 1970s, recognition of historic and cultural preservation led to the designation of a Chinatown-International District Historic District and Special Review District north

of the subject area. However, general industrial and commercial zones remained in place south of S. Weller Street. In 1987, existing zoning was established. Within the subject area, the IG2 zoning was applied to favor a use pattern with a “broad mix” of industrial and commercial activity that accommodates greater variety of commercial uses than the General Industrial 1 (IG1) zone.

The proposed rezone follows a trend from more general industrial zones, to those that accommodate a greater variety and intensity of commercial uses in the areas between the Downtown Urban Center and the MIC. Examples of this pattern include the Union Station development along 4th Avenue S., the Uwajimaya mixed-use complex between 5th and 6th Avenues S., and the development of the two stadiums to the west of the subject area.

The entire South Downtown vicinity is also being considered for rezones that relate to the local context, the existing and future planning context, and the regulatory framework relevant to each area. Therefore precedential effects are not anticipated. Particular to this subject area, the IC rezone is not expected to be precedential, due in part to physical separations of the area from the heart of the MIC, and because other similarly situated properties at the northern edge of the MIC are already zoned IC.

### **Neighborhood Plans**

The Greater Duwamish Manufacturing Industrial Area Plan Element of the Seattle Comprehensive Plan prioritizes the protection of industrial uses and family wage jobs through goals and policies that would:

- Restrict incompatible or competing land uses with the MIC;
- Encourage manufacturing and industrial job retention and growth;

- Retain and improve transportation access to and from industrial areas;
- Retain and encourage new manufacturing and industrial development within the MIC.

The Comprehensive Plan Industrial Lands Policies instruct the City to provide opportunities for industrial activity to thrive in Seattle by prohibiting uses (such as residential uses) that are incompatible with industry, particularly in areas where significant infrastructure and land mass exists to support a base of industrial uses (Policy LU 140).

Throughout the Livable South Downtown planning process, differing opinions were expressed as to the viability of industrial uses south of S. Dearborn Street within the Livable South Downtown planning area. Some groups advocated for a change from existing industrial zoning that would allow a greater range of uses for several reasons:

- While numerous small wholesale and light manufacturing uses exist in the area, land ownership and new uses indicate a trend away from the area’s traditional light industrial base toward office and other commercial uses;
- The area is located at the edge of the Chinatown/I.D. neighborhood, and features significant land that could accommodate residential and employment uses;
- The area is physically separated from other industrial uses;
- The area is well-served by transit and light rail and could support more intensive redevelopment and higher density of use.

Both the existing and proposed zones are Industrial. Therefore neither would be inconsistent with the purpose of the MIC. Commercial uses such as offices and other non-industrial facilities would be more likely to occur at higher densities under the IC zone than the existing IG2 zone, but even the IG2 zone accommodates a mix of commercial and industrial uses. This suggests that a rezone from IG2 to IC would not result in incompatible or competing land uses and would not significantly discourage manufacturing and industrial growth while providing a better transition to the non-industrial areas abutting it.

The development of many new roadways such as SR 517 allowing freight traffic to quickly bypass this area on the way to I-5 and I-90 suggests that new development encouraged by a rezone will not substantially impact existing transportation access to or from industrial areas.

### **Zoning Principles**

The subject area is well-defined to the east and south by highway structures of I-5, I-90 and SR 519. These structures extend up to 60 feet above surrounding roadways, providing a transition between the proposed rezone area and industrial-zoned areas to the south. The proposed IC zone height of up to 160 feet is a height consistent with the recommended building scale proposed for the adjacent Chinatown-International District to the north. The recommended IC zone is similar to the IG2 zone in that a broad range of commercial uses is allowed, and most residential uses are prohibited. However, the proposed IC zone would allow greater intensity of non-industrial uses and higher building height. Proposed zoning would also facilitate the development of pedestrian amenities within walking distance of the two light rail station areas, and incorporate design features consistent with the area’s location at the edge of the Downtown Urban Center.

Proposed heights of 160 feet are compatible with surrounding areas. A modest slope minimizes potential impact on views from the South of South Charles Street area from nearby higher locations. The existing IG2 zone that applies to the Duwamish industrial area to the south does not limit the height of industrial uses, though non-industrial uses are limited to 85 feet in height. Proposed zoning north of the subject area allows building heights up to 150 feet. While this area is not located in an urban village, height already exceed 40 feet both within the subject area and on adjacent parcels.

Overall, this rezone would not result in substantial impacts on less intense zones as the proposed heights are consistent with heights proposed for the area to the north and other adjacent areas are separated by physical barriers including I-5, I-90, and SR 519 roadways.

### **Impact Evaluation**

#### *Housing:*

The subject area is not known to include residential uses that are prohibited in industrial zones except as caretaker units or as part of artists' live-work quarters. No significant housing impacts of this rezone are identified for the subject area.

#### *Service/Utility Capacity:*

The Livable South Downtown FEIS identifies no significant adverse impacts from future potential area-wide growth related to the Livable South Downtown recommended rezones.

#### *Environmental Factors:*

The proposed rezone from an IG2 to an IC zone would encourage a future pattern of uses that is less likely to generate externalities such as noise and air quality impacts on the nearby William Booth House and other adjacent lots

with potential for residential uses near S. Charles Street. This would be due to a lower likelihood of heavy industrial activities in the subject rezone area that might include outdoor activities, round-the-clock movement of materials on-site, and/or indoor industrial processes generating noise and odors.

#### *Pedestrian Safety:*

The proposed rezone would not lead to pedestrian safety impacts, and could contribute to better pedestrian conditions in the future associated with future redevelopment. The area is currently lacking sidewalks on many streets. Future development projects would include the provision of pedestrian amenities consistent with project impacts.

#### *Manufacturing Activity:*

The subject area supports a variety of vehicle storage and maintenance uses, including the facility operated by the City of Seattle, as well as printing, signage-related, catering businesses, and a few other general commercial services or warehouse uses. At least one retail commercial use is present as well. A new automobile dealership was recently constructed in the area. The area does not include manufacturing uses. The rezone to IC would continue to accommodate general manufacturing uses and other similar activities, but would prohibit most (although not all) heavy manufacturing uses.

#### *Employment Activity:*

Under any zoning scenario, several smaller businesses would likely be displaced by redevelopment over time. New businesses and probable commercial or commercial-industrial uses would likely result in net increases in employment growth and increased employment density in the

subject area. Displacement of existing businesses could occur under either existing or proposed zoning, but is perhaps more likely to occur over the long term under the proposed zoning due the relatively greater density allowed within proposed zoning.

#### *Character of Areas Recognized for Architectural or Historic Value:*

The Livable South Downtown EIS included review of the subject area and its structures for landmark resource potential. It identified two structures that "may meet" Seattle Landmark Designation Criteria: the National Grocery Co. warehouse (Salvation Army Thrift Store on 4th Ave. S.) and the Romaine Electric Building/Washington Iron Works building at 1101 Airport Way S. The Livable South Downtown FEIS indicates that existing structures that may meet landmark criteria must be referred to the City's Department of Neighborhoods for an evaluation of their consistency with the criteria. This would be expected to occur on a site-by-site basis if or when these properties are proposed for redevelopment. It is not known at this time which of these sites would meet landmark criteria. Because this referral and evaluation process is already established by City policies, and because these properties have been inventoried, there is only a low risk that a potential landmark would be affected in a significant adverse manner by future development indirectly related to the proposed rezone.

#### *Shoreline Views and Access to Recreation:*

The proposed rezones could enable more shoreline views in potentially taller buildings, but the properties in their current conditions have no such views or only limited shoreline view potential toward the west, and no access to recreation. The rezone would not substantially impact existing shoreline views as they are located a third of a mile from the



water and away from local residential uses that are mostly located on hills where views would not be affected.

*Nonconforming Uses:*

No nonconforming uses are likely to be created by the proposed rezones. The difference between permitted uses in the Duwamish area’s IG2 zone and an IC zone would be a new prohibition on most heavy manufacturing uses and salvage yards. None of these uses are known to be present in the subject area, and all existing uses would likely remain within the range of uses permitted within either zone.

**Changed Circumstances**

Over the past few decades, the presence of industrial uses in the subject area appears to have declined, leading to a mix of primarily commercial uses. This mix is accommodated by the IG2 zone, but the scarcity of industrial uses now means there is a relatively low match between the subject area and the IG2 zone’s function and locational criteria. There also appears to be a trend in use patterns that could result in infill of more commercial uses. The proposed IC rezone would recognize an increased likelihood for future commercial or commercial/industrial development that could be more intensive in terms of number of employees on-site during daytime hours. It also recognizes that the subject area has potential to support campus-style development and is consistent with other criteria for the IC zone.

**Overlay Districts**

While located within the MIC, the subject area is not within an overlay district, even though the Land Use Code provides some area-specific regulations that are slightly different than for other Industrial-zoned areas in the city. This factor therefore has no bearing on the comparison between the existing and proposed zones.

**Critical Areas**

Mapped earthquake liquefaction hazards are present in the western half of this area due to the probable presence of fill or tideflats soils. An east-west fault is also believed to be present relatively near this area that contribute to overall seismic damage risks. Under nearly any development scenario, new structures would need to be designed with regard to seismic forces at a given site, and would be required by building codes to incorporate structurally stable design that would control the potential for damage and address life safety. Therefore, the presence of these liquefaction hazards and other seismic risks are essentially neutral with respect to a comparison of zoning options.

**Relationship to Height Criteria**

The following criteria relate to the selection of height limits for zones in which the designation of height is evaluated in addition to analysis of the zone designation. The relationship of these criteria to the proposed 160-foot height limit for the subject area is discussed below. Sections of the Livable South Downtown FEIS provide further analysis.

**Function of the zone**

The recommended 160-foot height limit and the proposed bulk and scale limitations would provide a flexible building envelope for structures that is consistent with the intent of the IC zone. The IC zone is intended to provide increased opportunities for commercial or commercial/industrial buildings or campus-like clusters of buildings. Displacement of preferred goods and service providers is not expected to occur in the subject area.

**Topography of the area and its surroundings**

The recommended 160-foot height limit is compatible with

the subject area’s topography which is lower than surrounding areas. This lower elevation allows the South of S. Charles Street area to accommodate taller buildings with less potential view blockage from its surroundings. The area is bounded on the east, west and south by freeway ramps up to 60 feet in height. The ramps provide a strong edge transition between the proposed rezone area and industrial-zoned areas to the south. The proposed IC zone height of up to 160 feet is also consistent with recommended building scale proposed for the Chinatown-International District to the north. Potential for view blockage was evaluated in the Livable South Downtown FEIS, and found to produce no significant adverse impacts.

**Height and scale of the area**

The existing 85-foot height limit for non-industrial uses accommodates construction methods involving wood or light steel frames over a concrete base. Most buildings in the area are only 1-2 stories, consistent with a prevalent pattern in the MIC to the south and with the area’s overall industrial function. The difference between existing building heights and existing zoned height limits indicates that buildings present today are not an appropriate measure of the area’s overall development potential.

By virtue of its proximity to the Downtown Urban Center and its geographic isolation from the rest of the MIC, the South of South Charles Street area is likely to accommodate taller buildings under any zone scenario.

**Compatibility with the surrounding area**

The existing height limit in zones immediately north is currently 85 feet. Other areas to the south and west are zoned 85 feet and 65 feet, respectively. The two athletic stadiums

to the west surpass 260 feet in height, though zoning generally allows building heights up to 65 feet in height. These existing conditions demonstrate compatibility between proposed zoning and existing zoned height limits in surrounding areas.

Livable South Downtown zoning recommendations for the area immediately to the north would establish a 150-foot maximum building height with which the recommended 160-foot height limit for the subject area is compatible in scale and building type. Future development at this scale would probably entail concrete and steel construction. Elevated highway structures to the south, east and partially to the west of the subject area limit the area’s view-blocking potential, and effectively separate the subject area from neighboring properties in the MIC to the south and west. The presence of two large athletic stadiums immediately across 4th Avenue S. at the west edge of the subject area also helps with scale transitions to the MIC.

The proposed height limits would maintain compatibility with the future recommended zoned height and scale of areas to the north and west, and the subject area would benefit in its transitions to the south and east from the presence of highway structures that provide a strong physical edge.

Relationship to neighborhood plan recommendations

The MIC’s plan did not recommend height limits for the subject area, but the plan’s policy direction and objectives generally suggest continuation of low-scaled zoning that would continue to accommodate industrial and manufacturing uses for the indefinite future.

Summary Table of Rezone Criteria

Criteria	Evaluation Criterion Favors:		
	General Industrial 2	Industrial Commercial	Neutral
Rezone Evaluation: Zone Function Statements 23.34.007 A		X	
General Rezone Criteria 1. Capacity to meet Growth Targets 2. Within density ranges in Sect. A1 of Comp Plan Land Use Element		X	X
Match Between Zone Criteria and Area Characteristics 23.34.008 B		X	
Zoning History and Precedential Effect 23.34.008 C		X	
Neighborhood Plans 23.34.008 D			X
Zoning Principles 23.34.008 E 1. Impact on less intensive zones 2. Physical buffers 3. Zone boundaries 4. Height limits	X	X X	X
Impact Evaluation 23.34.008 F		X	
Changed Circumstances 23.34.008 G		X	
Overlay Districts 23.34.008 H			X
Critical Areas 23.34.008 I			X

## DISCUSSION ABOUT PROPOSED AMENDMENTS TO REZONE CRITERIA

Included in Livable South Downtown recommendations are the following amendments to rezone criteria:

- Proposed amendments to 23.34.108 Downtown Mixed Commercial (DMC) zone function and locational criteria will expand the description of the DMC zone to apply to areas outside the commercial core both north and south.
- Proposed amendments to 23.34.110 Downtown Mixed Residential (DMR) zone function and locational criteria will expand the description of this zone to areas east of Interstate 5 in addition to areas north of the commercial core.

The rezone criteria link the planning intentions articulated by the Seattle Comprehensive Plan to the specific land use regulations codified in the Seattle Land Use Code. Seattle Comprehensive Plan Policy LU1 articulates this relationship as follows: “Use the goals and policies included in this Plan to identify on the Future Land Use Map the general locations where broad categories of land uses are preferred. Use rezone criteria which implement the goals and policies of this Plan to identify on the City’s Official Land Use Map where the specific zones are located.”

All areas discussed within this appendix are located on land the Comprehensive Plan designates as part of the Downtown Urban Center. Comprehensive Plan Policies including LU 175, 176 and 177 support the application of Downtown zones to areas within the Downtown Urban Center in order to help achieve the desired future character for different

Downtown areas. The area east of I-5 is already a part of the Downtown Urban Center, and the current planning effort has identified the need to rezone it to a Downtown zone designation as a way to encourage the type and level of development that would be appropriate in this part of the urban center.

Little Saigon, as part of the Chinatown/I.D. neighborhood, is also part of the Downtown Urban Center. The Comprehensive Plan’s Future Land Use Map already identifies Little Saigon as an area for mixed-use development. The recommended DMR and DMC zones for this area are consistent with a pattern of zoning around the Downtown office and retail cores where a mix of housing, employment and related support activities are encouraged. Comprehensive Plan policies such as DT-LUP 2, 3 and 4 also support this function.

The DMC and DMR function and locational criteria (SMC 23.34.108 and 23.34.110) are described in very specific geographical terms that are oriented to northern and western portions of Downtown. The existing criteria do not account for the potential application of these zones to the currently designated Mixed Use areas in the southern portion of the Downtown Urban Center. Therefore, the proposed Ordinance amends the criteria to accommodate the possibility of DMC and DMR zones located in the southernmost areas of the Downtown Urban Center, consistent with the objectives of Comprehensive Plan Goal DT-G7 and policies such as DT-LUP, 2, 3 and 4.